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11 Counsel for Defendant Marshay Goodspeed

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14 IN THE UNITED STATES DISTRICT COURT  
15  
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,  
18 Plaintiff,  
19 v.  
20 MARSHAY GOODSPEED,  
21 Defendant.

22 No. CR 13-00094 EMC

23  
24 **STIPULATION ADVANCING  
SENTENCING HEARING;  
[PROPOSED] ORDER**

25 Current Date: May 28, 2014  
26 Proposed Date: May 14, 2014  
27 Time/Place: 2:30 p.m.; Courtroom 5

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29 Due to the unavailability of defense counsel on the sentencing date set by the Court, the  
30 parties request that the sentencing hearing in this case be advanced from May 28, 2014, to  
31 **May 14, 2014, at 2:30 p.m.**, before this Court.

32  
33 **BACKGROUND INFORMATION**

34 On March 13, 2013, Ms. Goodspeed appeared before this Court and entered a plea of  
35 guilty on Count 1 of the indictment. At that appearance, the sentencing was set for May 28,  
36 2014, at 2:30 p.m., although the Court stated that the parties may submit a stipulation to advance  
37 the sentencing date after obtaining approval from probation.

38 Counsel for the government has no objection to advancing the sentencing schedule. The  
39 Probation Officer, Mark Unalp, has also been contacted and has no objection to advancing the  
40 sentencing hearing or the proposed date.

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1 Therefore, counsel request that the Court advance the sentencing hearing in this matter to  
2 **May 14, 2014, at 2:30 p.m.**, and stipulate to same.

3 Respectfully submitted,

4 STEVEN G. KALAR  
5 Federal Public Defender

6 /s

7 Dated: March 17, 2014

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9 BRANDON M. LeBLANC  
10 Assistant Federal Public Defender

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12 IT IS SO STIPULATED.

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14 MELINDA HAAG  
15 United States Attorney

16 /s

17 Dated: March 17, 2014

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19 NATALIE LEE  
20 Assistant United States Attorney

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22 [PROPOSED] ORDER

23 For the reasons stated above, and good cause appearing, IT IS HEREBY ORDERED that  
24 the sentencing hearing for Defendant Marshay Goodspeed is ADVANCED from May 28, 2014,  
25 to **May 14, 2014, at 2:30 p.m.**, before the undersigned.

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27 IT IS SO ORDERED.

28 Dated: March 19, 2014

